

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ALAN B. MARCUS, Individually and on Behalf of All Others Similarly Situated,	§	Case No.: 6:13-cv-00736-KNM
Plaintiff,	§	Magistrate Judge K. Nicole Mitchell
vs.	§	§
J.C. PENNEY COMPANY, INC., MYRON E. ULLMAN, III and KENNETH H. HANNAH,	§	§
Defendants.	§	§
	§	§

Captions Continue on Next Page

**REPLY DECLARATION OF THOMAS R. AJAMIE IN
FURTHER SUPPORT OF THE MOTION OF ALETTI GESTIELLE SGR S.P.A.
FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT
AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD COUNSEL**

ERHAN ERDEM, Individually and on Behalf of All Other Persons Similarly Situated, Plaintiff(s), vs. J.C. PENNEY COMPANY, INC., MYRON E. ULLMAN, III and KENNETH H. HANNAH, Defendants.

SHAWN GILBERT, Individually and on Behalf of All Others Similarly Situated, Plaintiff, vs. J.C. PENNEY COMPANY, INC., MYRON E. ULLMAN, III and KENNETH H. HANNAH, Defendants.

I, Thomas R. Ajamie, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Texas and this Court. I am a partner of the law firm of Ajamie LLP, Local Counsel for Aletti Gestielle SGR S.p.A. (“Aletti”), the proposed Lead Plaintiff in the above-captioned actions. I make this reply declaration in further support of Aletti’s Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached as Exhibit A is a true and correct copy of *Murdeswar v. Searchmedia Holdings Ltd.*, CV 10-6794, slip op. (C.D. Cal. Dec. 15, 2010).

3. Attached as Exhibit B is a true and correct copy of the Declaration of Axxion S.A. Luxemburg, on Behalf of Its Akrobat Fund-Value, in Support of Its Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel, *Corwin v. Seizinger*, No. 07-cv-6728 (S.D.N.Y. Oct. 22, 2007), Dkt. No. 30-1.

3. Attached as Exhibit C is a true and correct copy of *Massachusetts Laborers’ Annuity Fund v. Encysive Pharmaceuticals Inc.*, No. H-06-3022, slip op. (S.D. Tex. Mar. 20, 2007).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 30th day of December, 2013.

s/ Thomas R. Ajamie
Thomas R. Ajamie

CERTIFICATE OF SERVICE

I certify that on this 30th day of December, 2013, I electronically filed this Reply Declaration of Thomas R. Ajamie in Further Support of the Motion of Aletti Gestuelle SGR S.p.A. for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of Selection of Lead Counsel, using the Court's CM/ECF system, and the declaration and related papers will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

s/Thomas R. Ajamie

Thomas R. Ajamie